

**From:** Poore, Christine  
**Sent:** Monday, April 9, 2018 10:52 AM  
**To:** Coltrain, Katrina  
**Subject:** FW: Wilcox

**Categories:** filed

Hi Katrina,

I spoke with Matt and Michele regarding the new lead number. Given that we make it clear that this is an industrial number and the land will therefore have ICs to prevent residential use (example language below), they're ok with the use of 800.

In terms of PTW, I'd pushback on calling all of the source material PTW. Based on the risks provided, I don't know that it rises to that level.

Thanks,  
Christine

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**From:** Burgess, Michele  
**Sent:** Friday, April 06, 2018 2:44 PM  
**To:** Poore, Christine <Poore.Christine@epa.gov>; Newton, Heather <newton.heather@epa.gov>; Jefferson, Matthew <jefferson.matthew@epa.gov>  
**Subject:** RE: Wilcox

### Land Use

An important consideration in selecting the appropriate remedy at Superfund sites and RCRA facilities is the reasonably anticipated future land use. If the remedy includes a restricted land use, then institutional controls are generally necessary to prevent an unanticipated land use that could result in unacceptable exposures to residual contamination. Caution should be applied when selecting higher cleanup levels because ineffective controls or incorrect land use assumptions would have potentially greater health consequences.

For example, a child may trespass or visit a restricted site that has a soil concentration greater and is exposed for only 1 day or few days per week at the site and 6 days per week at the residence with a background soil lead concentration may experience a time-weighted average exposure greater than residential lead levels. Risk management decisions should also consider the potential for contamination from non-residential land to residential properties via track-in from trespass or from fugitive dust transport within a community. At some sites, track-in from non-residential areas to residential areas has been demonstrated to be a substantial exposure pathway (Sheldrake and Stifelman, 2003; von Lindern et al., 2003a,b). Therefore, in support of a public health policy that seeks to minimize controllable sources of lead exposure, OSRTI strongly recommends PRGs at non-residential sites at the lower end of the risk range at sites where the potential exists for track-in from site visitors or transpassers.

Michele Burgess, PhD  
Office of Land and Emergency Management  
Office of Superfund Remediation & Technology Innovation  
Science Policy Branch  
Ph: 703-603-9003  
Fax: 703-603-9112  
1200 Pennsylvania Ave., NW  
MC 5204P  
Washington, DC 20460

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**From:** Poore, Christine

**Sent:** Friday, April 06, 2018 2:14 PM

**To:** Burgess, Michele <Burgess.Michele@epa.gov>; Newton, Heather <newton.heather@epa.gov>; Jefferson, Matthew <jefferson.matthew@epa.gov>

**Subject:** Wilcox

Hey all,

The comments from DEQ include changing the CUL from 400 to 800. Do you have a few minutes this afternoon about the change in number?

Thanks!

Christine

Christine Poore

Site Assessment and Remedy Decision Branch

Office of Superfund Remediation and Technology Innovation

U.S. Environmental Protection Agency

Phone: 703-603-9022